

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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INSPIRED PURSUITS, LLC, *et al.*

Plaintiffs,

v.

Case No. 3:25-cv-00075-wmc

PARAGON COMPONENT SYSTEMS,  
LLC, *et al.*,

Defendants.

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**STIPULATION OF DISMISSAL OF DEFENDANTS ANDREW EWIN,  
DAVID REED, SCOTT HOELSMA, SETH DUNCAN, MICHAEL PITTS, AVERY  
RADMACHER, NATHAN BIEREMA, AND JEREMY BIEREMA WITHOUT  
PREJUDICE**

Plaintiffs Inspired Pursuits, LLC, Qualtim, Inc., Center for Building Innovation, LLC, DRJ Engineering, LLC, Kirk Grundahl, and Suzanne Grundahl, and Defendants Andrew Ewin, David Reed, Scott Hoelsma, Seth Duncan, Michael Pitts, Avery Radmacher, Nathan Bierema, and Jeremy Bierema (“Employee Defendants”), stipulate and agree to the dismissal of all claims against the Employee Defendants without prejudice. Each party shall bear its own attorneys’ fees and costs incurred in this action, reserving to defendants the rights provided by Rule 41(d), Fed. R. Civ. P.

s/Sam D. Elliott  
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s/Michael J. Bradford  
\_\_\_\_\_  
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*Counsel for Plaintiffs Qualtim, Inc., DRJ  
Engineering, LLC, Center for Building  
Innovation, LLC, Kirk Grundahl, Suzanne  
Grundahl, and Inspired Pursuits, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of June 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/Michael J. Bradford

Michael J. Bradford

*Counsel for Plaintiffs*